

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 23-3501-PET

Petition of Green Mountain Power for approval of its zero outages initiative as a strategic opportunity pursuant to 30 V.S.A. § 218d and GMP's multi-year regulation plan	
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**RESPONSES TO GREEN MOUNTAIN POWER'S FIRST SET OF
INFORMATION REQUESTS ON VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service ("Department") hereby provides the following responses to Green Mountain Power's ("GMP" or "Company") First Set of Interrogatories to the Vermont Department of Public Service served on the Department by GMP on March 22, 2024. The Department is serving these responses electronically through email on GMP.

GENERAL OBJECTIONS

1. The Department objects to any instructions contained in GMP's discovery requests to the extent such instructions purport to place on the Department greater requirements or reserve greater rights to GMP than are permitted by the Vermont Rules of Civil Procedure as made applicable to Vermont Public Utility Commission ("Commission" or "PUC") proceedings through Commission Rule 2.214(A).
2. The Department objects to any request for information or production of document(s) that is (or are) subject to attorney-client privilege, constitute work product, are protected under state or federal law or are proprietary, competitively sensitive or confidential, constitute draft and/or non-final documents and/or constitute communications containing or concerning any of the above.
3. The Department objects to the discovery requests to the extent that they (a) are overbroad or unduly burdensome; (b) are cumulative, speculative, or irrelevant; (c) call for the production of documents not in the possession, custody, or control of the Department; (d) call for the review, compilation, or production of publicly available documents that could be obtained by the requesting party in a less burdensome manner, including on a public website; (e) call for the review, compilation and/or production of documents already in GMP possession, custody, or control; (f) are vague and/or ambiguous; (g) seek information not reasonably calculated to lead to the discovery of admissible evidence; or (h) call for the review, compilation, or production of a voluminous number of documents at great expense to the Department.

4. Each of these General Objections shall be incorporated by reference into the below-referenced objections and responses as if expressly restated therein. The Department does not hereby waive any objections, and it reserves the right to later raise any additional, available objections.

RESPONSES TO INTERROGATORIES

Q. GMP.DPS.1-1: For each witness for whom DPS has submitted prefiled direct testimony:

- a. Please identify and produce all documents prepared by and/or relied upon by each witness, or any persons working for or under the direction of each witness, in connection with their testimony, including, but not limited to, the raw data and other results of any research or work conducted by the person, and any documents, data, research, articles, treatises or other information relied upon by the witness, including any documents generated by any other person which the witness consulted. For any document provided by GMP to DPS please just identify the document.
- b. Please identify and produce in their original format all electronic files that were utilized or generated to prepare any exhibit, or any analysis, images, impressions, conclusions, or statements presented in either their prefiled testimony or any associated exhibits.

A. GMP.DPS.1-1:

- a. Ms. Margolis, Mr. Jordan, Mr. Hunt, and Mr. Poor reference and provide all relevant documents in their respective direct testimonies, which are provided as exhibits or otherwise publicly available.

Ms. Flint references and provides most relevant documents in her direct testimony, which are provided as exhibits or otherwise publicly available. Ms. Flint also relied upon the following document provided herein as a discovery attachment:

- R4R Webinar 3 – Resilience and Equity Master PPT

Mr. Mara footnoted most of the GMP documents he relied upon in his testimony. The following are additional files upon which he reviewed and/or relied, which are either publicly available or provided hereto as discovery attachments:

- IEEE Benchmark Year 2022 Results for 2021 Data
- 2022 Vermont Comprehensive Energy Plan
- Vermont PUC Rule 4.900
- GMP Appendix F: 2018 Distribution Integrated Vegetation Management Plan
- GMP Appendix G: 2018 Transmission Integrated Vegetation Management Plan
- Moving Beyond Average Reliability Metrics – S&C Electric Company
- GMP Service Quality & Reliability Plan – Revised August 8, 2014
- GMP Multi-Year Regulation Plan 2020-2022
- NREL Battery Storage for Resilience

- NREL Laboratory Testing of Demand Response Enabled Household Appliances
- NREL Reliability of Emergency and Standby Diesel Generators: Impact on Energy Resiliency Solutions
- GMP 2022 Benchmarked Performance FY24 Annual Base Rate Filing
- Regional Peer Group Benchmark.xls
- Single Phase Improvements from GMP-MB-7 Case 21-3707.xls
- Cost per Feeder.xls
- GMP.DPS.Q3a Circuit Data Excl Storms.xls
- Case 20-0276-PET MYRP GMP.DPS1.Q99-Exh. GMP-MB-1 Preliminary T&D Project List Kmara Analysis.xls
- Attachment GMP.DPS2.Q103 RW Budgets.xls
- Attachment GMP.DPS2.Q94 Pole Age.xls
- Attachment GMP.DPS2.Q94 for KMZ.xls
- Attachment GMP.DPS.Q90a.xls
- Pole by Decade.xls
- GMP 2022 Prefiled Testimony Burke MB-7 List of Capital Projects.pdf

Mr. Thomas references and provides most relevant documents in his direct testimony, which are provided as exhibits or otherwise publicly available. Mr. Thomas also relied upon the following documents provided herein as discovery attachments:

- Attachment GMP.DPS.1-20
- Attachment GMP.DPS.1-24
- Attachment GMP.DPS.1-25

b. Exhibits provided in native format used by K. Mara:

- Exhibit DPS-KJM-2 National Benchmarking.doc
- Exhibit DPS-KJM-3 Pole Age.xls
- Exhibit DPS-KJM-4 Storm Costs.xls
- Exhibit DPS-KJM-5 Ohv UG Costs.xls
- Exhibit DPS-KJM-6 PW of UG v OH.xls
- Exhibit DPS-KJM-7 and 8 Battery Usage

Exhibits provided in native format used by W. Poor:

- Exhibit DPS-WP-1 ZOI Investment COS Effect GMP.xls

Exhibit provided in native format used by J. Thomas:

- Exhibit DPS-JMT-5 - Side-by-Side Comparison of FY27 Financial Statements
- Exhibit DPS-JMT-7 - Financial Incentive Formulas for Performance Metrics for Option II

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q.GMP.DPS.1-2: In Ms. Margolis’ opinion, if ZOI work was not started until after GMP’s next IRP was reviewed and approved, when does she expect that work could commence? Please explain the basis for this opinion.

A.GMP.DPS.1-2:

Objection – The Department objects to this request as it calls for speculation. Notwithstanding the objection, the Department responds as follows:

Ms. Margolis’ testimony does not specify that IRP review and approval would be required prior to starting work. To answer the hypothetical, GMP’s 2021 IRP was filed December 10, 2021, and approved by the Commission on November 22, 2022, approximately five months after the Department filed testimony and proposed MOU conditions. In the last several years, other utilities’ IRPs have been approved approximately 8-9 months after IRP filing.

However, as described in Ms. Margolis’ testimony, the process GMP is undertaking to develop its 2024 IRP presents an opportunity to simultaneously engage customers and communities on the ZOI and fold ZOI planning into broader system analysis and planning. In her testimony, Ms. Margolis recommend the engagement and planning work culminate in “a ZOI Phase I public-facing master plan that identifies projects that will be completed in Phase I along with cost estimates for each project.” This work could happen separately from the IRP – or as part of GMP’s next MYRP – but merging it with the IRP process would likely involve less duplication of effort, less stakeholder fatigue, more planning synergy, and a more expedient path to commencing work.

Person(s) Responsible for Response: Anne Margolis
Title of Person(s): Assistant Director of Regulated Utility Planning
Date: April 2, 2024

Q. GMP.DPS.1-3: Is the Department recommending that major storms be included in SQRP metrics for all utilities? If the answer is yes and major storms were to be included in SQRP metrics, does the Department believe the metrics would remain the same or need to change? Please explain why or why not.

A. GMP.DPS.1-3:

Objection – The Department objects to this request on the basis of relevance. Notwithstanding the objection, the Department responds as follows:

The Department is not, at this time, recommending that major storms be included in SQRP metrics for all utilities. The ZOI proposed by GMP is a unique initiative that seeks to achieve zero outages by 2030 with one of the largest requested expenditures of ratepayer dollars in Vermont. For these reasons, if the ZOI were to be approved, it would be appropriate to transition GMP to take all outages into consideration and not allow any to be excluded from its SQRP reliability metrics. As discussed in his direct testimony, Mr. Jordan recommends that major storms should be included in GMP's SQRP metrics and that these metrics should change (likely lowered), to be determined in a post-approval process, depending on what the Commission approves. If another utility were to propose a similar initiative, then it might be appropriate to include major storms in its SQRP metrics and/or change the metrics as well (this would be determined on a case-by-case basis, depending on the details of the proposal and what is approved by the Commission).

Person(s) Responsible for Response: Bill Jordan
Title of Person(s): Director of Engineering
Date: April 2, 2024

Q. GMP.DPS.1-4: Please refer to Tables 2-4 on pages 9-11 of Mr. Mara's testimony.

- a. For each of the peer utilities included in Mr. Mara's comparison, describe what Mr. Mara, or anyone acting under his direction, reviewed with respect to the specific reporting requirements underlying the reliability statistics for those utilities that are reporting under "other standards" in EIA-861. Please identify and produce any documents reviewed or relied upon related to each peer utility.
- b. What is Mr. Mara's understanding of each peer utilities' exclusions from reporting requirements or other regulatory requirements that impact reliability reporting?

A. GMP.DPS.1-4:

- a. Mr. Mara used the EIA-861 data found at this website.
<https://www.eia.gov/electricity/data/eia861/>
- b. Mr. Mara did not research reporting requirements or other regulatory requirements related to reliability reporting.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-5: Please refer to Mr. Mara's response to Question 12, page 9 and produce any documents relied upon or prepared in the process of responding to this question.

A. GMP.DPS.1-5:

Please see response to GMP.DPS.1-1. File relied upon was IEEE Benchmark Year 2022 Results for 2021 Data.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-6: Refer to exhibit DPS-KJM-5.

- a. Please provide all documents prepared and/or relied upon by Mr. Mara or any person working under his direction in the preparation of this exhibit, including but not limited to raw data, workpapers, and worksheets in their native format with all formula intact.
- b. Identify all documents, datasets, or other information Mr. Mara reviewed when “augmenting” the project lists in Exhibit DPS-KJM-5, including projects considered for but not included in the exhibit.

A. GMP.DPS.1-6:

- a. Please see response to GMP.DPS.1-1.
- b. Please see response to GMP.DPS.1-1 for Single Phase Improvements from GMP-MB-7 Case 21-3707.xls and see footnote in Exhibit DPS-KJM-5, which states that Mr. Mara relied upon Exhibit GMP-MB-7 from Case No. 21-3037-PET. Also see GMP 2022 Prefiled Testimony Burke MB-7 List of Capital Project.pdf.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-7: Refer to Exhibit DPS-KJM-7. Please provide all documents prepared and/or relied upon by Mr. Mara or any person working under his direction in the preparation of this exhibit, including but not limited to raw data, workpapers, and worksheets in their native format with all formula intact.

A. GMP.DPS.1-7:

Please see response to GMP.DPS.1-1.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-8: Please refer to Exhibit DPS-KJM-8 and pages 22 and 23 of Mr. Mara's testimony.

- a. Mr. Mara references 642 events of "five watts or less" in testimony, and 642 events of a 5.0 kWh. Please confirm which value and metric is used in Mr. Mara's analysis.
- b. Based on the answer to subpart (a), please describe in detail Mr. Mara's statement that 642 events used only [five watts] [5.0 kWh] or less, "which could be an indication of a depleted battery at a home," including all assumptions relied upon in reaching that opinion.
- c. Please provide all documents prepared and/or relied upon by Mr. Mara or any person working under his direction in the preparation of Exhibit DPS-KJM-8, including but not limited to raw data, workpapers, and worksheets in their native format with all formula intact.

A. GMP.DPS.1-8:

- a. To clarify, Mr. Mara meant to state the 642 events of five kilowatt-hours or less.
- b. Please see Mr. Mara's Direct Testimony Page 22 lines 17-18 that a refrigerator draws 150 watts and can run for one to two hours. The 642 events lasted between 24 hours and 72 hours. Just having a refrigerator energize through the 1-to-3 day outage, it would draw more than 5 kWh over that time period. Of course, other energy consuming devices such as lights, entertainment systems, etc. would also be on during this period. Therefore, it would be reasonable to assume that in 1 to 3 days, the home would consume more than 5 kWh if it were available from the battery.
- c. Please see attachments in response of GMP.DPS.1-1 for the file with formulas intact.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-9: Please refer to page 13 of Mr. Mara’s testimony and Table 5. Please confirm that the calculation that the “compounded growth rate in right-of-way maintenance has increased 5.3% between FY20 and FY24” was a simple comparison of the yearly vegetation management costs.

A. GMP.DPS.1-9:

The reference was for the weighted average of 5-year and 7-year trim cycles. Please see Response GMP.DPS.1-1, File Attachment GMP.DPS.Q103 RW Budgets.xls for formulas.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-10: On page 12, Mr. Mara's opinion is that enhanced vegetation management is a traditional method to address the primary cause of outages. Please produce any documents prepared by Mr. Mara calculating or related to the costs associated with the enhanced vegetation management methods he suggests (ground-to-sky clearing, increased trim width, expanded hazard tree removal, or shorter trim cycles) and the frequency of the recurrence of those costs? Please define 'ground-to-sky' clearing as used in this response, including any height limitations.

A. GMP.DPS.1-10:

Mr. Mara's opinion did not include costs associated with vegetation management.

Ground to sky clearing means no tree limbs encroach within the right-of-way from the ground to the sky. Meaning, no limb overhangs the right-of-way and no ground cover of any significant height.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-11: Please provide (or identify if provided by GMP) all documents prepared or relied upon, in native format, in developing the scatter plot described on pages 28-29 and Table 8 on page 29.

A. GMP.DPS.1-11:

Please see Response GMP.DPS.1-1 GMP.DPS1.Q3a Circuit Data excl Storm.xls.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-12: Please describe in detail how Mr. Mara developed his estimate of the cost to upgrade all rural circuits discussed on page 28. Please provide all supporting documentation in native format.

A. GMP.DPS.1-12:

Mr. Mara's testimony included the following formula: 154 circuits at \$20 million per circuit. The number of rural circuits is contained in file GMP.DPS1.Q3a Circuit Data excl Storm.xls (reference response to GMP.DPS.1-1). The cost per mile was based on the East Jamaica Circuit EJ-G7 as shown in Table 7 in Mr. Mara's Direct Testimony.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-13: For any of the utilities listed in Tables 2-4 on pages 9-11 that are also located in New England states, is Mr. Mara aware of any use or requirement to apply the NESC extreme wind or extreme ice (NESC Rule 250C and 250D) standard discussed on pages 19-20 to distribution lines (i.e. not joint-use or transmission poles)? If so, please identify which utilities.

A. GMP.DPS.1-13:

Mr. Mara is not aware of any use or requirement for the GMP peer group referenced in his testimony to apply the NESC extreme wind or extreme ice to pole under 60 feet in height.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-14: In reference to the NESC Rule 250C and 250D standards described on pages 19-20 of Mr. Mara's testimony, please identify and produce any documents or analysis Mr. Mara prepared or reviewed related to the potential cost differential of building infrastructure to these standards compared to GMP's current standard.

A. GMP.DPS.1-14:

Mr. Mara has not conducted such an analysis.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-15: Please provide all supporting calculations and documents in native format prepared by Mr. Mara in developing his conclusion on page 30, lines 1-6, that a 33% reduction in SAIFI and SAIDI should be established as a potential metric.

A. GMP.DPS.1-15:

Please see GMP.DPS1.Q3a Circuit Data excl Storm.xls DPS Response to GMP.DPS.1-1. See Tab “CAIDI SAIFI SAIDI” for current reliability. See Tab “Improvement Results” for 33% reduction note. Mr. Mara set the CI and CHO to zero for feeders 56G1, BEG28, BS-G32, CH-G11, DM-G6, EJ-G7, EJ-G40, EN-G26, HR-G38, MH-G13, PS-G43, SH-G35, and WF-G23 to determine the improvement in SAIFI and SAIDI.

Person(s) Responsible for Response: Kevin Mara
Title of Person(s): Executive Vice President of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-16: Does Mr. Hunt agree that the regulatory accounting approach GMP has proposed does not authorize the inclusion of specific O&M costs in rates as part of this filing? If not, please explain why not.

A. GMP.DPS.1-16: Yes. However, Mr. Hunt notes that the regulatory accounting approach GMP has proposed does seek authorization to defer specific categories of ZOI project costs that GMP will seek recovery of in future base rate filings and believes those categories of costs should be evaluated in this proceeding.

Person(s) Responsible for Response: Steven Hunt
Title of Person(s): Principal, GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-17: Regarding Mr. Hunt's testimony on page 6, lines 10-14, does Mr. Hunt agree the baseline or measurable criteria he is recommending for assessing incremental ZOI O&M costs can be incorporated into and evaluated as part of the annual base rate review GMP proposed as part of the ZOI regulatory accounting methodology? If not, please explain why not.

A. GMP.DPS.1-17: No. Mr. Hunt believes that determining a baseline or measurable criteria is necessary in this proceeding to develop the ratemaking construct or framework that will be used in the future base rate proceeding. The base rate proceeding will be the opportunity to provide the cost inputs and demonstrate the prudence and just and reasonableness of the cost inputs. However, to further develop the rate design construct or framework for the ZOI projects at the next base rate case will prevent regulatory certainty for GMP, intervening parties, and the Commission.

Person(s) Responsible for Response: Steven Hunt
Title of Person(s): Principal, GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-18: Regarding Mr. Hunt's testimony on page 10 regarding plant-in-service balances and retirements, does Mr. Hunt agree that it would be appropriate to utilize a methodology that nets the depreciation costs associated with any retired assets against new ZOI related depreciation costs, and only defer the net depreciation for inclusion in a future rate filing? If not, please explain why not.

A. GMP.DPS.1-18: Yes.

Person(s) Responsible for Response: Steven Hunt
Title of Person(s): Principal, GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-19: Regarding Mr. Hunt's testimony on page 10, lines 13-16 on potential costs savings associated with ZOI work, please identify any specific types of cost savings Mr. Hunt estimates would be sufficiently known and measurable within the first 12 months of completing ZOI related projects to include in the regulatory asset.

A. GMP.DPS.1-19: Please see Mr. Hunt's testimony on page 10:19-20, identifying depreciation and O&M costs on retired assets. Specific O&M costs savings associated with ZOI work projects may differ from one project to another. Nevertheless, examples of cost savings associated with the undergrounding project may include a reduction or elimination of budgeted outside services for vegetation surveillance and pruning or above ground pole and line inspections. Additionally, savings that may be measurable include peak shaving from use of the batteries.

Person(s) Responsible for Response: Steven Hunt
Title of Person(s): Principal, GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-20: Regarding Mr. Foley's and Mr. Thomas' testimony on page 6, lines 3-7 regarding the cumulative rate increase in the third year of the first phase of ZOI, please state the average annual increase associated with your calculation and provide all documents and analysis supporting the calculation in native format.

A. GMP.DPS.1-20: A cumulative increase of 3.55% would be achieved by a three-year compound average growth rate of 1.17% per year. Please see the Excel version of Exhibit DPS-JMT-5 provided in response to GMP.DPS.1-1 and see **Attachment GMP.DPS.1-20.xlsx** for supporting computations.

Person(s) Responsible for Response: Jacob Thomas
Title of Person(s): Principal of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-21: Regarding Mr. Foley's and Mr. Thomas' testimony on page 8, lines 1-4 regarding the hypothetical rate increase associated with a full ZOI implementation, please provide all documents and analysis supporting your calculations in native format.

A. GMP.DPS.1-21: There is no additional analysis other than computing as follows:
 $\$1.5\text{billion} / \$280\text{M} \times 3.55\% = 19\%$.

Person(s) Responsible for Response: Jacob Thomas
Title of Person(s): Principal of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-22: Have Mr. Foley and Mr. Thomas conducted any analysis to determine what level of cumulative rate increases customers may experience over the same period used for their calculations on page 8, lines 1-4 if ZOI work is not completed? If not, please explain why not.

A. GMP.DPS.1-22: We relied upon the information provided by GMP, as shown in Exhibit DPS-JMT-5, which shows a side-by-side comparison of operating statements between a non-ZOI and a ZOI approach. Any cost increases associated with not completing ZOI work would presumably be included in the non-ZOI projections provided by GMP. We therefore did not conduct any further analysis.

Person(s) Responsible for Response: Jacob Thomas
Title of Person(s): Principal of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-23: Do Mr. Foley and Mr. Thomas agree that the regulatory accounting methodology proposed in this case imposes greater risk on GMP compared to the standard regulatory accounting approach that would otherwise apply to distribution system projects in a traditional cost of service proceeding? Please explain why or why not.

A. GMP.DPS.1-23: Whether risk sharing tied to performance metrics is considered more or less risky compared to traditional COS cost recovery depends on the specifics of the regulatory framework, the design of the performance metrics, and the utility's ability to influence outcomes. Well-designed, performance-based regulation can incentivize utilities to improve performance while providing mechanisms to manage and mitigate risks. However, if performance targets are unrealistic or too heavily penalized, or if too much revenue is put at risk, it could introduce significant uncertainty and financial risk for utilities. The Department has made an effort to provide well designed performance metrics which share the risk equally between rate payer and GMP.

Person(s) Responsible for Response: Jacob Thomas
Title of Person(s): Principal of GDS Associates, Inc.
Date: April 2, 2024

Person(s) Responsible for Response: Sean Foley
Title of Person(s): Chief of Finance and Economics for the Vermont Department of Public Service
Date: April 2, 2024

Q. GMP.DPS.1-24: Regarding the Department's proposed penalty metrics, are the interim operational metrics outlined in Option II designed with the Department's proposed \$50M capital limit in mind? Please explain why or why not.

A. GMP.DPS.1-24: Yes. We applied a reduction factor in the overall net income developed by GMP's full ZOI request to reflect only \$50 million in capital spending per the Department's proposed limit. I think took 50% of that amount to represent 50/50 sharing between GMP and the ratepayers. See Attachment GMP.DPS.1-24.xlsx.

Person(s) Responsible for Response: Jacob Thomas
Title of Person(s): Principal of GDS Associates, Inc.
Date: April 2, 2024

Q. GMP.DPS.1-25: Regarding the Department’s proposed penalty metrics, please provide backup calculations that led to “Est St. Dev.” and “Scalar” coefficients for each “Target”.

A. GMP.DPS.1-25: See Excel version of Exhibit DPS-JMT-7 provided in response to GMP.DPS.1-1.

Metric 1 – estimated standard deviation is the average of minimum and target level. Scalar is set to ensure maximum disallowance equals \$207,000.

Metric 2 - estimated standard deviation is the average of minimum and target level. Scalar is set to ensure maximum disallowance equals \$207,000.

Metric 3 – estimated standard deviation is computed as the standard deviation of the 5-year rolling average storm costs from 2014-2023. Scalar is set to ensure maximum disallowance equals \$207,000. Refer to Attachment GMP.DPS.1-15.xlsx.

Metric 4 - estimated standard deviation is the average of minimum and target level. Scalar is set to ensure maximum disallowance equals \$207,000.

Metric 5 – these values are not applicable.

Person(s) Responsible for Response: Jacob Thomas
Title of Person(s): Principal of GDS Associates, Inc.
Date: April 2, 2024

DATED at Montpelier, Vermont this 2nd day of April 2024.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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